IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of
A. Doddington

Filing Date: Herewith

Attorney File No.: 14856-15

Entitled: System and Method For Decoupling Data
Presentation Layer and Data Gathering and
Storage Layer in a Distributed Data Processing
System

Assistant Commissioner for Patents
Alexandria, VA 22313-1450

PETITION TO MAKE SPECIAL UNDER 37 C.F.R. §1.102

SIR:

It is requested that the above-captioned patent application, filed herewith, be granted Special Status for accelerated Examination. As set forth in MPEP §708.02(VIII), such a petition requires: (1) that all claims be directed to a single invention; (2) a pre-examination search; (3) copies of all of the references identified in the search deemed most closely related to the claimed subject matter; (4) a detailed discussion pointing out with particularity how the claimed subject matter is patentable over the references; and (5) the fee set forth in 37 C.F.R. 1.17(h). As presented in more detail below, Applicant have compiled with each of these requirements. Therefore, Applicant respectfully requests granting of this petition.

I.   APPLICANTS' CLAIMED INVENTION

Applicant's claimed invention is directed to a system and method that provides a new framework for decoupling the presentation and business layers in a distributed data processing system. A software protocol is provided which defines data and identified functions that are available to the business layer and the presentation layer. In this manner, the data and functions of the business layer may be obtained by the presentation layer in the same format. Thus, functionality that previously had to be individually programmed into both the presentation layer

and the business layer can now be automatically obtained by the presentation layer from the business layer.

II. THE PATENT APPLICATION PRESENTS CLAIMS TO A SINGLE INVENTION

The claims of the patent application filed herewith are directed to a single invention. The current application includes two independent claims. Independent claim 1 is directed to a method to effect an interface between a business layer and a presentation layer by defining a data structure that is usable by both. Independent claim 11 is directed to an apparatus that uses data and functions stored in a data set across both a presentation layer and a business layer.

Should the Examiner determine that the claims are not directed to a single invention, Applicants will make an election without traverse according to established telephone-restriction practice, MPEP § 708.02(VII).

III. PRE-EXAMINATION SEARCH

A pre-examination search was performed by the professional search firm of Woolcott LLC ("Woolcott") to locate the U.S. Patents and U.S. Patent Publications relevant to the inventive concept (the "Search"). Woolcott is located at 2001 Jefferson Davis Highway, Suite 411, Arlington, Virginia 22202, Tel: 800.223.9697 and has a web page address of http://www.woolcott.com/index.html.

Copies of Woolcott's Search Report and the identified references are attached. As can be seen from this Search Report, the following classes and subclasses were searched:

Class	Subclasses
707	104.1, 100
709	200, 223

Woolcott pointed out five references deemed most closely related to the claimed subject matter: (A) U.S. Publication Number 20030084067, which was published on May 1, 2003 by Obiaya; (B) U.S. Publication Number 20030052897, which was published on March 13, 2003 and related U.S. Publication Number 20030033159, which was published on February 13, 2003, both by Altomare; (C) U.S. Publication Number 20020124113, which was published on September 5, 2002 by Gargya et al.; (D) U.S. Publication Number 200300009323, which was published on January 9, 2003 by Adeli; (E) U.S. Publication Number 20020133579, which was published on September 19, 2002 by Bernhardt et al.; and (F) U.S. Publication Number

20030033121, which was published on February 13, 2003 by Chen et al. (herein collectively referred to as the "Relevant References"). Each of the Relevant References is discussed in detail, below.

Nothing in this Petition should be construed as an admission that any reference identified in the Search or discussed herein is available as prior art to the above-captioned application.

IV.   DETAILED DISCUSSION OF PATENTABILITY

The claimed subject matter of the above-captioned patent application is patentable over the Relevant References. Applicants provide detailed discussion in this Section that points out with particularity how the claimed subject matter is patentable over the Relevant References.

A. U.S. PUBLICATION NUMBER 20030084067, WHICH WAS PUBLISHED ON MAY 1, 2003 BY OBIAYA ("Obiaya")

The subject matter of the above-captioned patent application is patentable over Obiaya. Among other deficiencies of Obiaya, it does not teach or suggest a system and method that provides a framework for decoupling the presentation and business layers in a distributed data processing system; wherein the framework defines data and identified functions that are available to the business layer and the presentation layer as recited in Applicant's claims.

Obiaya discloses a method and apparatus for asset management for tracking and displaying information relating to assets. This tool can include multiple database modules, each of which may store different types of asset information. The tool features multiple user interface modules, each of which has access to a predetermined set of database modules. In terms of the above-captioned patent application, the application layer has access to only those business layer modules that are programmed into the application layer.

Because Obiaya does not teach or suggest Applicant's framework for decoupling presentation and business layers in a distributed data processing system, Applicant's invention as claimed is patentable over Obiaya.

B. U.S. PUBLICATION NUMBER 20030052897, PUBLISHED ON MARCH 13, 2003 AND RELATED U.S. PUBLICATION NUMBER 20030033159, PUBLISHED ON FEBRUARY 13, 2003, BOTH BY ALTOMARE (collectively "Altomare")

The subject matter of the above-captioned patent application is patentable over both Altomare publications. Among other deficiencies of Altomare, it does not teach or suggest a system and method that provides a framework for decoupling the presentation and business

layers in a distributed data processing system; wherein the framework defines data and identified functions that are available to the business layer and the presentation layer as recited in Applicant's claims.

Altomare teaches a method for an interface module for use in electronic commerce. Specifically, Altomare teaches an interface module that uses a template object for defining the format template of documents which are used for carrying out business processes.

Because Altomare does not teach or suggest Applicant's framework for decoupling presentation and business layers in a distributed data processing system, Applicant's invention as claimed is patentable over Altomare.

C. U.S. PUBLICATION NUMBER 20020124113, WHICH WAS PUBLISHED ON SEPTEMBER 5, 2002 BY GARGYA ET AL. ("Gargya")

The subject matter of the above-captioned patent application is patentable over Gargya. Among other deficiencies of Gargya, it does not teach or suggest a system and method that provides a framework for decoupling the presentation and business layers in a distributed data processing system; wherein the framework defines data and identified functions that are available to the business layer and the presentation layer as recited in Applicant's claims.

Gargya teaches a system and method to form a bridge between a server and a client of different object types. The bridge provides a mapping between or among the various server(s) and client(s) object types. This type of intermediate step is eliminated by Applicant's invention.

Because Gargya does not teach or suggest Applicant's framework for decoupling presentation and business layers in a distributed data processing system, Applicant's invention as claimed is patentable over Gargya.

D. U.S. PUBLICATION NUMBER 200300009323, WHICH WAS PUBLISHED ON JANUARY 9, 2003 BY ADELI ("Adeli")

The subject matter of the above-captioned patent application is patentable over Adeli. Among other deficiencies of Adeli, it does not teach or suggest a system and method that provides a framework for decoupling the presentation and business layers in a distributed data processing system; wherein the framework defines data and identified functions that are available to the business layer and the presentation layer as recited in Applicant's claims.

Adeli discloses a configuration tool that provides the capability to modify a presentation layer without having to access the source code to change a language used by the presentation

layer. Adeli uses a database key on those fields in the presentation layer that are language sensitive that couples the database to a localization database (for local languages).

Because Adeli does not teach or suggest Applicant's framework for decoupling presentation and business layers in a distributed data processing system, Applicant's invention as claimed is patentable over Adeli.

E. U.S. PUBLICATION NUMBER 20020133579, WHICH WAS PUBLISHED ON SEPTEMBER 19, 2002 BY BERNHARDT ET AL. ("Bernhardt")

The subject matter of the above-captioned patent application is patentable over Bernhardt. Among other deficiencies of Bernhardt, it does not teach or suggest a system and method that provides a framework for decoupling the presentation and business layers in a distributed data processing system; wherein the framework defines data and identified functions that are available to the business layer and the presentation layer as recited in Applicant's claims.

Bernhardt teaches methods, systems and computer programs from a rules-based delegation of administration powers. A hierarchy of rules is defined to facilitate determination of delegation of administration powers.

Because Bernhardt does not teach or suggest Applicant's framework for decoupling presentation and business layers in a distributed data processing system, Applicant's invention as claimed is patentable over Bernhardt.

F. U.S. PUBLICATION NUMBER 20030033121, WHICH WAS PUBLISHED ON FEBRUARY 13, 2003 BY CHEN ET AL. ("Chen")

The subject matter of the above-captioned patent application is patentable over Chen. Among other deficiencies of Chen, it does not teach or suggest a system and method that provides a framework for decoupling the presentation and business layers in a distributed data processing system; wherein the framework defines data and identified functions that are available to the business layer and the presentation layer as recited in Applicant's claims.

Chen teaches a rules-based capacity management system for an inter-office facility. Chen discloses a data layer and a presentation layer having a business layer interface. The business layer creates analytical reports responsive to the rules-based presentation layer and the data layer.

Because Chen does not teach or suggest Applicant's framework for decoupling presentation and business layers in a distributed data processing system, Applicant's invention as claimed is patentable over Chen.
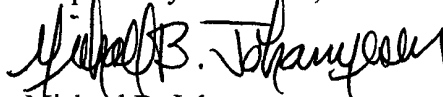
G. PATENTS OF POSSIBLE ADDITIONAL INTEREST.

U.S. Patent No. 6,480,894, which issued November 12, 2002 to Courts et al. and U.S. Patent No. 5,960,200 which issued September 28, 1999 to Eager et al. were cited in the search results as being of "possible additional interest." Neither of these two patents teaches or suggests a system and method that provides a framework for decoupling the presentation and business layers in a distributed data processing system; wherein the framework defines data and identified functions that are available to the business layer and the presentation layer as recited in Applicant's claims. Therefore, Applicant's invention as claimed is patentable over these two references.

V. CONCLUSION

In view of the foregoing, Applicants' have met all of the requirements for accelerated examination set forth in 37 C.F.R. § 1.102 and detailed in MPEP § 708.02(VIII). Accordingly, Applicants respectfully request this case be made special for expedited examination. Please charge the required fee set forth in 37 C.F.R. § 1.17(h), estimated to be $130.00, to Deposit Account No. 501358.

Respectfully submitted,

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